

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOHN BRUENS, MARY STEWART, MARC
SIROCKMAN, MELISSA VAUGHN

Defendants.

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) Criminal No. 05-10102-JLT
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**DEFENDANT MARC SIROCKMAN'S MOTION FOR
MODIFICATION OF ORDER SETTING CONDITIONS OF RELEASE**

Defendant Marc Sirockman hereby requests that this Court modify its Order Setting Conditions of Release so as to allow Mr. Sirockman to travel to the Grand Cayman Islands from November 18th to November 25th, 2006 for a family vacation. In support of this Motion, Mr. Sirockman states as follows:

1. On May 25, 2005, this Court entered its Order Setting Conditions of Release which allowed, among other things, Mr. Sirockman to maintain his passport and to travel internationally on business, provided that he file an itinerary with Pretrial Services in advance of business travel. The government fully assented to this arrangement. Since that time, he has been to Canada and back *many* times and there have been absolutely no issues.

2. Additionally, in July 2005, the government assented to, and this Court allowed, Mr. Sirockman to take his yearly *family vacation* internationally in Ontario, Canada, and he, as usual, returned without incident.

3. Mr. Sirockman is asking this Court's permission to again travel internationally for a family vacation, this time to the Grand Cayman Islands over the Thanksgiving holiday.

4. There is no danger that Mr. Sirockman will not return as he has an excellent job, his children and family are extensively involved in their community and schools, and his extended family all reside in the United States.

5. Mr. Sirockman hereby requests that the Court modify its Order so as to allow Mr. Sirockman to travel to the Grand Cayman Islands for this family vacation. Mr. Sirockman will depart by plane on November 18, 2006 and return on November 25, 2006. He will provide pre-trial services with a full itinerary prior to his departure and will complete any check-in requirements that this Court may order.

WHEREFORE, Mr. Sirockman respectfully requests that this Court modify its Order Setting Conditions of Release as set forth above.

Respectfully submitted,

MARC SIROCKMAN,

By his attorneys,

/s/ McKenzie E Webster
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Dated: August 10, 2006

Local Rule 7.1(A)(1) Certification

I hereby certify that this Motion has been previously discussed by defense counsel with counsel for the Government. AUSA Carmody has indicated that she will oppose this Motion.

/s/ McKenzie E Webster

McKenzie E Webster

Certificate of Service

This is to certify that a copy of the foregoing motion was filed electronically in compliance with ECF procedures on this 10th day of August 2006.

/s/ McKenzie E Webster

McKenzie E Webster